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April 1, 2024

Via ECF
Hon. Vernon S. Broderick
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 04/02/2024

Re: United States v. Joseph Mitchell
22-cr-624 (VSB)

Dear Judge Broderick:

I was substituted as counsel on February 8, 2024 to represent Mr. Mitchell on the above captioned matter. On February 29, 2024, I requested additional time to apprise Your Honor of how we plan to proceed in this case. Your Honor granted that request on March 4, 2024, directing that I submit a written status update as to how we will proceed no later than today, April 1, 2024.

The AUSA assigned to this case, Mr. James Ligtenberg, has understandably been unavailable to discuss this matter with me for the past several weeks as he has been on trial. I was finally able to meaningfully confer with Mr. Ligtenberg about our position this morning. Based on that conversation, I respectfully request an additional week to advise my client on the Government's position as was communicated to me today before updating the Court on how we plan to proceed. This additional time would ensure that Mr. Mitchell is fully apprised of his options and any consequences resulting from each of them. I would respectfully request until April 9, 2024 to advise the Court of how we plan to proceed. James Ligtenberg, AUSA, has no objection to this request.

Your Honor's time and consideration in this matter is greatly appreciated.

Respectfully Submitted,

/s/ Lorraine Gauli-Rufo, Esq.
Lorraine Gauli-Rufo, Esq.
Attorney for Joseph Mitchell

cc: James Ligtenberg, AUSA